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January 28, 2016

Via ECF & Hand Delivery
Hon. Denise L. Cote
United States District Judge
United States District Court
for the Southern District of New York
500 Pearl Street
New York, NY 10007-1312

Re: United States v. Arthur Budovsky, Docket No. 13 Cr. 368 (DLC)

Dear Judge Cote:

In response to the Court's Order, Docket Entry 296, we advise Court that with respect to the issue of homosexuality we request the Court include the following instruction as formulated by the Court:

You may hear evidence that one or more of the individuals that the Government contends ran Liberty Reserve is homosexual. Do you have any views about homosexuality that would make it difficult for you to be fair and impartial juror in this case?

Respectfully submitted,
/s/
Donna R. Newman
/s/
John Kaley
cc: All counsel of record via ECF